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Counsel for Defendant, Peggy Larez

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,)	No.: 12-00792 YGR
)	
Plaintiff,)	STIPULATION AND ORDER DENYING
)	REQUEST TO TRAVEL
v.)	
)	Date: December 20, 2012
PEGGY LAREZ, et al.)	Time: 9:30 a.m.
)	Court: Honorable Yvonne Gonzalez Rogers
Defendant.)	
)	
)	
)	
)	

1. On November 14, 2012, a detention hearing was held and the Court ordered Ms. Larez released to the custody of her mother in Red Bluff, California, with certain conditions, including electronic monitoring and home detention. Ms. Larez has been abiding by the conditions imposed by the court since her release.
2. When Ms. Larez was released, the initial appearance in front of the District Judge was scheduled for December 20, 2012, at 2:00 p.m.
3. On November 27, 2012, the Court notified the parties that the time of the hearing had been changed from 2:00 p.m. to 9:30 a.m.
4. Red Bluff is more than three and a half hours from Oakland; moreover, Ms. Larez and her mother will be making that drive during the morning rush-hour commute. As such, the drive could take much longer than three and a half to four hours.

- 1 5. For these reasons, Ms. Larez respectfully requests that she be allowed, in the custody of
2 her mother, to drive from Red Bluff to Santa Cruz on the evening of December 19, 2012.
3 Ms. Larez, with her mother, will spend the night at Linda and Randy Swart's house, 231
4 Arbor Ave., Santa Cruz, CA 95062.
- 5 6. The government does not object to the request that Ms. Larez be allowed to travel to, and
6 spend the night in, Santa Cruz on December 19, 2012, the evening before her initial
7 appearance in District Court. Pretrial services, however, does object to the request.

8
9 SO STIUPLATED:

10 Dated: December 10, 2012

_____-s-_____
11

Randy Luskey,
Assistant United States Attorney
12

13 Dated: December 10, 2012

_____-s-_____
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Nicole E. Giacinti,
Attorney for Peggy Larez
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17 ORDER

18 For the reasons stated above, the Court grants Ms. Larez's request to travel to and spend
19 the night at 231 Arbor Avenue in Santa Cruz, California on the evening of December 19, 2012.
20 IT IS SO ORDERED.

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23
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25 Dated: 12/13/12 _____

